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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYES QUINONEZ,

Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO

STIPULATION AND ORDER RE EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;

DATE: July 17, 2024

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

This case is set for status conference on July 17, 2024. By this stipulation, defendant now moves to vacate the status conference and set the case for a change of plea hearing on August 19, 2024, and to exclude time between July 17, 2024, and August 19, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

a) The government represents that discovery in this matter, including officer worn body camera, police reports, and other items have been produced to defense.

b) The parties are close to an agreement and need the additional time to finalize a plea agreement and prepare for the change of plea hearing.

c) Defense counsel also requests the additional time to review the discovery, meet with his client, conduct independent investigation.

d) Counsel for defendant believes that failure to grant the above-requested

continuanace would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 17, 2024 to August 19, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

2. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 11, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

Dated: July 11, 2024

/s/ REED GRANTHAM
REED GRANTHAM
Counsel for Defendant
Reyes Quinonez

ORDER

IT IS SO ORDERED.

DATED: 7/11/2024

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE